

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

---

**MONICA COLLIER**, an individual,  
and on behalf of all others similarly situated,

Plaintiff,

Case No. 18-CV-804  
Hon. JANET T. NEFF

v.

**VITALE'S PIZZERIA OF HUDSONVILLE, LLC,  
MAURIZIO LOGIUDICE**, an individual, and  
**MANDY TITHOF**, an individual,  
jointly and severally,

Defendants.

---

Robert Anthony Alvarez (P66954)  
Agustin Henriquez (P79589)  
**Avanti Law Group, PLLC**  
Attorneys for Plaintiff  
600 28th St. SW  
Wyoming, MI 49509  
(616) 257-6807  
[ralvarez@avantilaw.com](mailto:ralvarez@avantilaw.com)

Eric Matwiejczyk (P46222)  
**Law Offices of Duff, Chadwick and Associates**  
Attorney for Defendants  
220 W Main St  
Ionia, MI 48846  
(616) 527-0020  
[ericm@duffchadwickpc.com](mailto:ericm@duffchadwickpc.com)

---

**EXPEDITED CONSIDERATION REQUESTED**

**PLAINTIFF'S MOTION FOR A PROTECTIVE AND CORRECTIVE ORDER**

NOW COMES the Plaintiff Monica Collier, by and through her attorneys at Avanti Law Group, PLLC, and for her Brief in Support of Plaintiff's Motion for a Protective and Corrective Order states as follows.

Since the commencement of the instant case, Defendants have repeatedly communicated threats to putative plaintiffs and Class members alike designed to mislead, coerce, and prejudice the putative plaintiffs and Class members. As will be further in the Brief in Support, Defendants'

communications with putative plaintiffs and Class members were blatant attempts to coerce or threaten them into not joining the lawsuit and thus undermining it entirely. Plaintiff hereby request that the Court enter a protective order to stop these inappropriate communications from continuing.

WHEREFORE, Plaintiff request this Court to enter a Protective Order prohibiting all unauthorized contact with putative Class members, as well as enter a Corrective notice to putative Class members as to the remarks Defendants have made to them.

Respectfully Submitted,

Dated: August 29, 2018

/s/ Robert Anthony Alvarez.  
Robert Anthony Alvarez (P66954)  
Attorney for Plaintiffs  
Avanti Law Group, PLLC  
600 28th Street SW  
Wyoming, MI 49509  
(616) 257-6807  
[ravarez@avantilaw.com](mailto:ravarez@avantilaw.com)